

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

UNITED STATES OF AMERICA,

v.

CHARLES ALSTON, M.D., *et al.*,

Defendants.

INDICTMENT NO.

1:19-CR-10041-JDB

DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS

COMES NOW, Defendant Charles Alston ("Defendant"), by and through undersigned counsel, and provides notice to the Court of his voir dire questions. The questions are as follows:

1. What city do you live in?
2. Does anyone own your home/residence?
3. Does anyone rent your home/residence?
4. Education
 - a. How many of you have a GED?
 - b. How many of you have a high school diploma?
 - c. How many of you attended college?
 - d. How many of you attended graduate school?
5. Employment
 - a. How many of you work in the medical profession?

b. How many of you work in a supervisory position?

6. Clinic

a. Have you ever been treated at an urgent care clinic?

b. Have you ever been treated at a pain management clinic?

c. Does anyone have private insurance?

d. Does anyone have TennCare?

7. Pain Medicine

a. Have you, a friend, or family member ever been prescribed pain medication?

b. Have you, a friend, or family member ever refused pain treatment?

c. Have you, a friend, or family member ever been denied treatment for pain?

d. Have you, a friend, or family member ever been addicted to pain medication?

e. Have you, a friend, or family member ever been to a rehab facility?

f. Has anyone ever taken more medication than prescribed or recommended (for example, four Advil instead of two for headache or back pain)?

g. Does anyone regularly take prescribed medication for a medical condition?

8. Have you or a member of your family ever served in the military?

9. Do you belong to any social, civic, professional or religious organizations?

10. Have you ever donated money or time to any law enforcement organization?

11. Have you ever donated money or time to any victim's rights organization?
12. Have you ever donated money or time to any rehab or addiction program?
13. How many of you have voted in the last five years?
14. Are you involved in local politics in the city or county?
15. Have you ever held a political position, e.g. city council, school board, etc.?
16. Have you ever held a position of authority outside of your employment, e.g. Home Owner's Association, Volunteer Organization, Sports Organization, etc.
17. Do you generally read magazines or newspapers?
18. Do you have any bumper stickers on your vehicles?
19. Do you have a favorite radio talk show host(ess) that you regularly listen to?
20. Have any of you served on a Grand Jury before (state or federal)?
21. Have any of you served on a Trial Jury before (state or federal)?
22. Have you or a close friend or family member ever been a party to a lawsuit?
23. Have you or a close friend or family member ever been arrested, charged or convicted of a criminal offense, other than for a traffic violation?
24. Have you or a close friend or family member ever been the victim of a crime?
25. Have you or a close friend or family member ever been employed in the criminal justice system, either as law enforcement or in a prosecutor's office?

26. Have you or a close friend or family member ever received any legal training, practiced law, or worked in an attorney's office?
27. Does anyone have any beliefs or opinions regarding law enforcement which would cause you to be biased for or against the government or the defendants?
28. Would any member of the panel tend to believe or disbelieve the sworn testimony of a witness solely because that witness is law enforcement?
29. Does anyone believe that an accused must have done something because they are in court?
30. Do you believe every person has a right to a competent and vigorous defense?
31. Do you believe that every person is presumed innocent, regardless of the seriousness of the charges pending against them?
32. Have any of you ever applied for a criminal warrant to have someone arrested?
Please give details.
33. Have any of you ever appeared as a witness in a criminal case either at trial or a grand jury? If so, please give details.
34. Do any of you believe a defendant in a criminal trial must prove his/her innocence?
35. Does anyone believe that because of our laws, too many criminals go free?

Respectfully submitted this 30th day of December 2019.

/s/ Manubir S. Arora
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing *DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS* upon all parties involved via the federal e-filing system.

This 30th day of December 2019.

/s/ Manubir S. Arora

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CERTIFICATE OF CONSULTATION

I hereby certify that on this day (12/30/19), opposing counsel was contacted via electronic mail and informed of Defendant's intention of filing the within and foregoing *DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS*, and on this day (12/30/19), counsel for the Government has not notified Defendant of its stance on the motion at hand. Notwithstanding, the Government has objected to all other motions by Defendant.

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